

**Congress of the United States**  
**Washington, DC 20515**

January 13, 2023

The Honorable Jessica Rosenworcel  
Chairwoman  
Federal Communications Commission  
45 L Street NE  
Washington, D.C. 20554

Dear Chair Rosenworcel:

I write to express deep concerns about the Federal Communications Commission's (FCC) new National Broadband Map. As you know, this map is critical for determining eligibility for many federal broadband grants, including the Rural Development Broadband ReConnect Loan and Grant program and the new Broadband Equity, Access, and Deployment (BEAD Program). The allocation of these critical funds depends on an accurate map of broadband accessibility; however, the FCC's map falls short in some key areas, which I urge you to address before issuing the final version of the map.

First, I am concerned about the methodology used to construct this new broadband map. Unlike New York State's broadband map, the federal map appears to have not included field work and assessments. Instead, the federal map relies on self-reported data from broadband providers, and "hundreds of location-specific data sources." While these sources may serve as a starting point, the lack of field assessments reduces the accuracy of the map and leads to discrepancies between actual service availability and the service availability self-reported by broadband providers. For years many broadband and internet providers have been accused of overstating their speed and coverage, falsely disqualifying underserved communities from receiving federal assistance to expand internet coverage. These discrepancies are clear when looking at the challenge that New York State filed with the FCC.

According to New York State's Public Service Commission, there are 139,598 locations that do not have high-speed broadband available. However, 31,798 of these locations were incorrectly labeled on the FCC's map, which states that these locations do, in fact, have accessible high-speed broadband. That is an unacceptable error rate of 22.8 percent. Furthermore, The Public Service Commission also found that numerous addresses were simply missing from the map, meaning that beyond the poor accuracy of the broadband data, the map itself is flawed. How can Americans trust the accuracy of this broadband map when some cannot even find their home address on it?

Next, the Schools, Health, & Libraries Broadband Coalition and the New York State Education Department has shared legitimate concerns that the FCC's broadband map fails to provide availability information about libraries and other community anchor institutions (CAIs). Many individuals, particularly in rural areas, depend on these institutions to provide high-speed broadband access when it is unavailable at their homes. While the BEAD Program allows CAIs to receive funds to upgrade broadband speeds, the FCC broadband maps exclusion of these institutions reduces the likelihood they will receive the upgrades they need. Furthermore, in a New York State sampling of library buildings with low internet connectivity rates, 90 percent were either designated as ineligible for broadband services, or have missing location information. While I understand that these institutions were originally excluded because some purchase non-mass market broadband, this is not universally true. CAIs that purchase mass-market

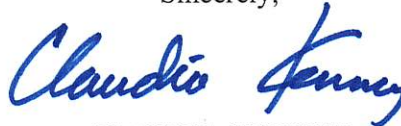
broadband services must be included in the FCC's broadband map to provide lawmakers and grant administrators the best information possible.

Finally, the FCC must reconsider its deadline that only gives individuals until January 13 to submit a dispute. Not every individual has heard of the FCC's broadband map, and many may not be aware of the consequences of incorrect data. Instead of limiting challenges and disputes, the FCC should continually strive to update their maps with the most accurate information. With a map of this importance, quality should be valued above all else.

As you know, these new maps will have massive ramifications for communities across the country, including many in my district, without sufficient broadband availability. While I understand that this version of the map is just a pre-production draft, I implore you to address these concerns as the FCC works towards a final version of its new broadband maps.

Thank you for your consideration of these concerns. Please follow up with my office as soon as possible to update me on what actions are being taken to address these concerns and improve the quality of our nation's broadband maps.

Sincerely,

A handwritten signature in blue ink that reads "Claudia Tenney". The signature is fluid and cursive, with the first name "Claudia" and the last name "Tenney" clearly distinguishable.

CLAUDIA TENNEY  
Member of Congress